

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

MARY KAY, INC.,

Plaintiff,

v.

JENNIFER BICKEL COOK,

Defendant.

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CASE NO. 3:21-cv-02543-C

**UNOPPOSED MOTION TO EXTEND DEADLINE TO ANSWER OR OTHERWISE  
RESPOND TO COMPLAINT BY DEFENDANT JENNIFER BICKEL COOK**

Defendant Jennifer Bickel Cook (“Cook” or “Defendant”) files this unopposed motion to extend the deadline to answer or otherwise respond to the complaint filed by Plaintiff Mary Kay, Inc. (“Mary Kay” or “Plaintiff”), and would show the following:

1. Mary Kay filed its original complaint on October 15, 2021 (Dkt. 1). Cook was served on November 9, 2021 (Dkt. 5). Pursuant to the Federal Rules of Civil Procedure, Cook’s deadline to answer or otherwise respond to Mary Kay’s complaint is currently November 30, 2021.

2. The undersigned counsel was just retained by Cook and needs time to investigate the allegations contained in Mary Kay’s lengthy complaint against Cook. Additionally, the current answer deadline falls right after the Thanksgiving holiday during which time the undersigned counsel will be out of town for the entire week.

3. Cook therefore seeks a 21-day extension of the November 30, 2021 deadline until December 21, 2021 to answer or otherwise respond to Mary Kay’s complaint.

4. This request for extension of the answer deadline is not made for purposes of delay, nor will any party be prejudiced by the granting of this motion. Mary Kay is unopposed to this extension.

**PRAYER**

Defendant respectfully request that the Court grants this motion, extends the deadline for her to answer or otherwise respond to Plaintiff's complaint to December 21, 2021, and for such other relief that she may show herself justly entitled.

Respectfully submitted,

By: /s/ Eric C. Wood  
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ATTORNEYS FOR DEFENDANT  
JENNIFER BICKEL COOK

**CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred on November 18, 2021 with counsel for Plaintiff, Christopher Schwegmann, regarding the relief requested in this motion, and he stated he was unopposed to the extension.

/s/ Eric C. Wood  
Eric C. Wood

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary because this document is being filed with the Court's electronic-filing system on November 18, 2021.

/s/ Eric C. Wood  
Eric C. Wood